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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 BENJAMIN GALECKI,
15 Defendant.
16

Case No. 2:15-cr-00285-APG-EJY-2

**Stipulation for Extension of Time
to File Defendant's Response to
the Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)
(Tenth Request)**

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18 Defendant Benjamin Galecki, by counsel, requests the current
19 April 11, 2022, deadline for Mr. Galecki's Response to the Government's Motion
20 to Substitute and Forfeit Property be extended by 60 days, with the deadline
21 reset for June 10, 2022.

22 Having obtained consent to resolve this matter on terms satisfactory to
23 both Mr. Galecki and co-defendant Burton Ritchie and negotiated those terms at
24 length with government counsel, counsel for Mr. Galecki and Mr. Ritchie are still
25 awaiting final approval from the government on the most recent revised draft of
26 that stipulated agreement.

1 Specifically, counsel for Mr. Galecki and Mr. Ritchie and the government
2 reached a preliminary agreement on most material matters but have been
3 waiting since February 8, 2022 for government counsel's supervisors, the
4 Department of the Treasury, and the Internal Revenue Service to comment on
5 the language contained in that agreement. Without input from those sources,
6 government counsel advises he is without authority to move forward. Although
7 the government process is not completed, the government changed the proposed
8 preliminary agreement with more government levels to review. Until the process
9 is completed and the changed preliminary agreement is returned to the defense
10 counsel for their and their clients' reviews, government counsel has no authority
11 to sign it.

12 As such, additional time is necessary to receive comment from government
13 counsel's supervisors, the Department of the Treasury, and the Internal Revenue
14 Service on the preliminary agreement and to communicate any such comments to
15 Messrs. Galecki and Ritchie and counsel for Stephanie Ritchie before the
16 preliminary agreement may be presented to the Court.

17 Given the continued significant progress in negotiating resolution of the
18 motion to substitute and to forfeit, which if successful will negate the need for
19 Mr. Galecki to file a Response, Mr. Galecki requests an extension of time to file
20 the Response. In the event negotiations fail, Mr. Galecki will file Response to the
21 Government's Motion to Substitute and Forfeit Property (ECF No. 582), or
22 present his own proposed forfeiture order for the Court's consideration.

23 Counsel does not make this request for purposes of delay but acts with
24 diligence and for the purpose of resolving the final forfeiture order in an efficient
25 manner without extended litigation and without unnecessarily taxing judicial
26 resources.

1 Mr. Galecki thus respectfully requests a 60-day extension of his Response,
2 and government counsel AUSA Daniel Hollingsworth advises he does not object
3 to this 60-day extension.

4 This is the tenth request for an extension of time.

5 DATED this 4th day of April, 2022.

6 RENE L. VALLADARES
7 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

8 */s/ Amy B. Cleary*
9 By _____
10 AMY B. CLEARY
Assistant Federal Public Defender

/s/ Daniel D. Hollingsworth
By _____
11 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 BENJAMIN GALECKI,

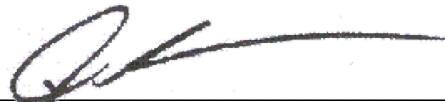
7 Defendant.
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Case No. 2:15-cr-00285-APG-EJY-2

**Order Resetting Deadline for
Defendant's Response to the
Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)**

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10 **IT IS HEREBY ORDERED** that the current April 11, 2022, deadline for
11 Defendant's Response to the Government's Motion to Substitute and Forfeit
12 Property (ECF No. 582) is vacated, extended by 60 days, and reset for
13 June 10, 2022, by which Mr. Galecki shall either submit his Response and any
14 other filing he deems appropriate or a signed stipulation by all the relevant
15 parties resolving the forfeiture issues.

16 **Dated** this 5th day of April, 2022.

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19 UNITED STATES DISTRICT COURT JUDGE
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